



April 27, 2016

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

On March 30, 2016, the FCC released its order reforming the Universal Support Fund (USF) regime for rural local exchange carriers (RLECs).<sup>1</sup> One provision of the reform order was the creation of an alternative, incentive-based support mechanism, utilizing a "forward-looking, efficient mechanism [and] model-based support."<sup>2</sup>

James Valley Cooperative (James Valley) is an RLEC serving northeastern South Dakota. For more than sixty years, James Valley (SAC 391664) has worked hard to provide quality telecommunications service to its members. James Valley applauds the FCC's efforts at USF reform and looks forward to embracing the new Alternative Connect America Fund (A-CAM) model framework.

The recently-released order precludes model participation from companies having "deployed 10/1 broadband to 90 percent or more of its eligible locations in a state, based on June 2015 Form 477 data that has been submitted as of the date of release of this

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<sup>1</sup> Report and Order FCC 16-33, hereafter referred to as the "USF reform order." Accessed at [https://transition.fcc.gov/Daily\\_Releases/Daily\\_Business/2016/db0330/FCC-16-33A1.pdf](https://transition.fcc.gov/Daily_Releases/Daily_Business/2016/db0330/FCC-16-33A1.pdf).

<sup>2</sup> USF reform order, ¶4.

# JAMES VALLEY

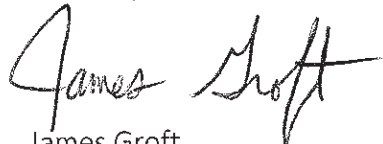
TELECOMMUNICATIONS

Order.”<sup>3</sup> James Valley has been in the process of updating its Form 477 data, consistent with the FCC’s rules. Earlier this year, it revised its December 2015 Form 477 data, and as a continuation of those efforts, on March 30, 2016 filed updated June 2015 Form 477 data.

Attachments A and B to this letter document that James Valley’s June 2015 Form 477 data was submitted on the date of the release of the order and, per the language of the order, should be incorporated into the next run of the A-CAM.<sup>4</sup> Despite that fact, on April 7 the FCC issued a public notice noting “No FCC Form 477 revisions were submitted on March 30, 2016.”<sup>5</sup> Additionally, the illustrative results issued that same day did not include projected model-based support for James Valley under tab 6.1.<sup>6</sup>

James Valley Cooperative requests that the FCC incorporate its updated June 2015 Form 477 data into subsequent runs of the A-CAM, pursuant to the USF reform order. If the FCC needs any additional information, please feel free to contact me at [jgroft@nvc.net](mailto:jgroft@nvc.net).

Sincerely,



James Groft  
General Manager  
James Valley Cooperative

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<sup>3</sup> USF reform order at ¶166: “. . . we will not make the offer of model-based support to any carrier that has deployed 10/1 broadband to 90 percent or more of its eligible locations in a state, based on June 2015 FCC Form 477 data that has been submitted as of the date of release of this Order.”

<sup>4</sup> Recently-released FAQs also note Form 477 data “that was filed on or before March 30 *will be incorporated* into the final version of the A-CAM.” Accessed at <https://transition.fcc.gov/wcb/RoR%20Reform%20Order%20FAQs.docx>.

<sup>5</sup> FCC Public Notice DA 16-378. Accessed at [https://apps.fcc.gov/edocs\\_public/attachmatch/DA-16-378A1.docx](https://apps.fcc.gov/edocs_public/attachmatch/DA-16-378A1.docx)

<sup>6</sup> FCC’s illustrative results 6.0, based on A-CAM 2.2. Accessed at [https://transition.fcc.gov/wcb/ACAM22v2\\_III\\_Rprt\\_6\\_0\\_040716\\_FINAL.xlsx](https://transition.fcc.gov/wcb/ACAM22v2_III_Rprt_6_0_040716_FINAL.xlsx).



## Form 477 - Local Telephone Competition and Broadband Reporting

FRN: 0003709888 | [Log Out](#)

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### Form 477 Filing Summary

FRN: **0003709888** | Data as of: **Jun 30, 2015** | Operations: **ILEC** | Submission Status: **Revised - Submitted** | Last Updated: **Mar 30, 2016 21:57:38**

### Filer Identification

Legend ✓ Error free ✗ Error included

Section	Question	Response
Filer Information	Provider Name	James Valley Cooperative Telephone Company
	Holding Company Name	James Valley Cooperative Telephone Company
	SAC ID	391664
	499 ID	801384
Data Contact Information	Data Contact Name	Tanya Berndt
	Data Contact Phone Number	(605) 725-1073
	Data Contact E-mail	tanyab@nvc.net
Certifying Official Contact Information	Certifying Official Name	James Groft
	Certifying Official Phone Number	(605) 397-2323
	Certifying Official E-mail	jgroft@nvc.net

### Fixed Services

#### Fixed Broadband Deployment

1 files and **6289** records accepted:

File Name	Date & Time	Number of Rows	Status
JVT Deployment CSV Data.csv	Mar 30, 2016 21:51:08	6289	<span style="color: green;">✓</span>

#### Fixed Broadband Subscription

1 files and **51** records accepted:

File Name	Date & Time	Number of Rows	Status
JVT_FBS_6.30.15.csv	Mar 30, 2016 21:56:47	51	<span style="color: green;">✓</span>

For help or assistance please contact us at 1-877-480-3201 or 1-717-338-2824 (TTY) or you may submit requests online via **e-support**. (<https://esupport.fcc.gov/request.htm>)

Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Phone: 1-888-225-5322  
TTY: 1-888-835-5322  
Fax: 1-866-418-0232  
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[Plain Writing Act \(http://www.fcc.gov/encyclopedia/plain-writing-fcc\)](http://www.fcc.gov/encyclopedia/plain-writing-fcc)  
[2009 Recovery and Reinvestment Act \(http://www.fcc.gov/encyclopedia/american-recovery-and-reinvestment-act-2009\)](http://www.fcc.gov/encyclopedia/american-recovery-and-reinvestment-act-2009)

(RETAIN FOR YOUR RECORDS)  
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Operations: ILEC

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Emergency Operations Contact Information	Emergency Operations Name	James Groft
	Emergency Operations Phone Number	(605) 397-2323
	Emergency Operations E-mail	jgroft@nvc.net
Certifying Official Contact Information	Certifying Official Name	James Groft
	Certifying Official Phone Number	(605) 397-2323
	Certifying Official E-mail	jgroft@nvc.net

## Data Submitted

Form Section	File Name	Date & Time	Number of Rows
Fixed Broadband Deployment	JVT Deployment CSV Data.csv	Mar 30, 2016 21:50:27	6289
Fixed Broadband Subscription	JVT_FBS_6.30.15.csv	Mar 30, 2016 21:55:06	51
Fixed Voice Subscription	Interactive data entry 0		11

## Fixed Broadband Deployment

### Census Block Counts by State, DBA Name and Technology

State	DBA Name	Technology	Blocks
North Dakota	James Valley Telecommunications	ADSL2	9
South Dakota	James Valley Telecommunications	ADSL2	3135
		Optical Carrier/Fiber to the End User	10
		Terrestrial Fixed Wireless	3135
Total			6289

Fixed  
Broadband  
Subscription

Fixed Broadband Subscriptions by State, Technology and End-user Type

State	Technology	Census Tracts	Subscriptions		
			Consumer	Business / Govt	Total
North Dakota	Asymmetric xDSL	3	4	0	4
South Dakota	Asymmetric xDSL	30	1716	144	1860
	Optical Carrier/Fiber to the End User	2	22	6	28
	Terrestrial Fixed Wireless	16	333	7	340
Total		51	2075	157	2232

Fixed Broadband Subscriptions by Bandwidths and End-user Type

Downstream Bandwidth (in Mbps)	Upstream Bandwidth (in Mbps)	Consumer	Business / Govt	Total
0.768	0.500	57	4	61
1.500	0.500	74	2	76
8.000	1.000	759	25	784
10.000	10.000	0	1	1
25.000	3.000	1185	125	1310
Total		2075	157	2232

Fixed Broadband Subscriptions by Technology, Bandwidths and End-user Type

Technology	Downstream Bandwidth (in Mbps)	Upstream Bandwidth (in Mbps)	Consumer	Business / Govt	Total
Asymmetric xDSL	0.768	0.500	57	4	61
	1.500	0.500	74	2	76
	8.000	1.000	550	22	572
	10.000	10.000	0	1	1
	25.000	3.000	1039	115	1154
Optical Carrier/Fiber to the End User	25.000	3.000	22	6	28
Terrestrial Fixed Wireless	8.000	1.000	209	3	212
	25.000	3.000	124	4	128
Total			2075	157	2232

Fixed Voice  
Subscription

VGE Lines and VoIP Subscriptions by State and End-user Type

State	Total VGE Lines	Consumer VGE Lines	Total VoIP Subscriptions	Consumer VoIP Subscriptions
North Dakota	7	7	0	0
South Dakota	2901	2254	0	0
Total	2908	2261	0	0

Fixed Voice  
Subscription  
(VGE Lines)

VGE Lines Provided to Unaffiliated Providers by State

State	Wholesale	UNE-L
North Dakota	0	0
South Dakota	0	0
Total	0	0

VGE Lines Provided to End Users by State, Bundle and Product Type

State	Total	by Bundle		by Product Type			
		Sold w/ Internet	Sold w/o Internet	Consumer		Bus-Govt	
				& No PIC	& PIC	& No PIC	& PIC
North Dakota	7	4	3	2	5	0	0
South Dakota	2901	2238	663	182	2072	52	595
Total	2908	2242	666	184	2077	52	595

VGE Lines Provided to End Users by State, Ownership and Last-mile Medium

State	Total	by Ownership			by Last-mile Medium			
		Owned	UNE-L	Resale	FTTP	Coax	Fixed Wireless	Copper
North Dakota	7	7	0	0	0	0	0	7
South Dakota	2901	2901	0	0	48	0	12	2841
Total	2908	2908	0	0	48	0	12	2848